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**FILED**  
DISTRICT COURT OF GUAM

AUG - 6 2007

**JEANNE G. QUINATA**  
Clerk of Court

Attorneys for Defendant LeoPalace Resort

IN THE DISTRICT COURT  
OF GUAM

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

LEO PALACE RESORT,

Defendant.

) CASE NO. 1:06-CV-00028

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JENNIFER HOLBROOK,  
VIVIENE VILLANUEVA and  
ROSEMARIE TAIMANGLO,

Plaintiff-Intervenors,

vs.

MDI GUAM CORPORATION dba LEO  
PALACE RESORT MANENGGON HILLS  
and DOES 1 through 10,

Defendants.

**NOTICES OF MOTION AND MOTIONS:**

**(1) TO COMPEL TESTIMONY AND  
PRODUCTION OF DOCUMENTS, OR IN  
THE ALTERNATIVE, TO DISMISS  
EMOTIONAL DISTRESS CLAIMS;**

**(2) TO EXTEND DISCOVERY  
COMPLETION DEADLINE;**

**(3) FOR INDEPENDENT MEDICAL  
EXAMINATION**

Please take notice that on Wednesday, August 29, 2007 at the hour of 1:30 p.m., Defendant Leoplace Resort shall move to compel plaintiff-intervenors to respond to discovery concerning their medical history, as more fully described in the accompanying Memorandum. Defendant will also move for an extension of the existing discovery completion deadline for limited purposes and

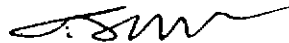
for a Rule 35 independent medical examination, all as more thoroughly described in the accompanying Memorandum.

These motions are based upon this Notice of Motion and Motion, the accompanying Memorandum, the accompanying Declaration of Tim Roberts, and all documents and pleadings on file in this action.

Dated this 6<sup>th</sup> day of August, 2007.

DOOLEY ROBERTS & FOWLER LLP

By



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**TIM ROBERTS**

Attorneys for Defendant